

EXHIBITS

- EXHIBIT #1** Doctor appointment with Benjamin Tweel for Vertigo **CONFIDENTIAL**
- EXHIBIT #2** Emergency Eye Infirmary Visit Sunday Feb. 20, 2022 **CONFIDENTIAL**
- EXHIBIT #3** Doctor 's Letter and Visit with Benjamin Zaremski Vertigo and fractured rub
- EXHIBIT #4** Nov. 23, 2022 Email Subject Increased Attorney's Fees from Anderson Duff
- EXHIBIT # 5** Nov. 16, 2022 Mr. Duff's email with EAI000066 EAI eBay receipt
- EXHIBIT # 6** Second Production of Ebay receipt on Nov 16, 2022 numbered as EAI000066
- EXHIBIT # 7** Plaintiff's Octobre 29, 2022 Request for Ebay Receipt
- EXHIBIT # 8** Plaintiff's Evidence 000151 dated email March 5, 2015, Plaintiff email to Mr.Bahr for biography recommendation to askART.
- EXHIBIT # 9** Plaintiff's Evidence 000150 dated email from June 6, 2015 documented the Plaintiff written communication to Bob Bahr regarding Plaintiff's biography on askART.
- EXHIBIT # 10** Plaintiff's Evidence 000153 Wayback Machine confirming 2015 year for Plaintiff's askART biography on askART website.
- EXHIBIT # 11** Plaintiff's Evidence 000154 Wayback Machine confirming 2015 year for Plaintiff's askART biography on askART website.
- EXHIBIT # 12** WorthPoint's evidence WP000141 and WP000141 2010 askART listing for Plaintiff's askART biography on askART website MISSING PLAINTIFF's NAME
- EXHIBIT # 13** WorthPoint's evidence WP000143 and WP000144 2014 askART listing for Plaintiff's askART biography on askART website MISSING PLAINTIFF's NAME.
- EXHIBIT # 14** Dec. 2, 2022 Email Subject Attorney's Fees from Adam Bialek
- EXHIBIT # 15** Summons of Complaint in Georgia WITHOUT SIGNATURE
- EXHIBIT # 16** Complaint in Georgia page 3 of 7 Wrong Dates and Facts for 18-Cv-0993 NYC
- EXHIBIT # 17** January 11,2021 Certified Mail Will Seippel
- EXHIBIT #1 8** Affidavit From Server Freddi Simon
- EXHIBIT # 19** Summary Judgement in Georgia Filed October 31, 2022

EXHIBIT #1

CONFIDENTIAL

**DOCTOR'S
APPOINTMENT**

EXHIBIT #2

CONFIDENTIAL

**EYE
APPOINTMENT**

EXHIBIT #3

CONFIDENTIAL

**DOCTOR'S LETTER
AND
APPOINTMENT**

12/19/2022

EAI

Exhibit

Gmail - Increased Attorneys' Fees

#4



Annamarie Trombetta <atrombettaart@gmail.com>

Increased Attorneys' Fees

Anderson Duff <ajd@hoganduff.com>

Wed, Nov 23, 2022 at 1:06 PM

To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>, Annamarie Trombetta <atrombettaart@gmail.com>

Cc: "Farmer, Jana S." <Jana.Farmer@wilsonelser.com>, "Haimson, Nicole" <Nicole.Haimson@wilsonelser.com>, "Bialek, Adam" <Adam.Bialek@wilsonelser.com>

Ms. Trombetta:

Because you do not seem to understand the severity of the situation you have created, I am again writing to remind you that my clients will be seeking an award of attorneys' fees under § 505 of the Copyright Act and/or because you rejected my clients' offer of judgment. For your information, today's conference added roughly \$1,500 in attorneys' fees for my clients alone.

Best,

-Anderson-

646.450.3607

HoganDuff.com

Mail - Annamarie Trombetta - Outlook

Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Anderson Duff <ajd@hoganduff.com>

Wed 11/16/2022 1:08 PM

To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Cc: Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

1 attachment (105 KB)

EAI000060-EAI000060.pdf;

Dear Ms. Trombetta:

Please find a version of the email previously produced as EAI000058-EAI000059 attached. As previously discussed, my clients are producing this email again solely because a small portion of the email was cutoff when it was converted to a .pdf. To avoid confusion, I have stamped the email as EAI000060 rather than reproducing it with the same bates number. Since you have taken the position in several filings that I fabricated evidence because the @ symbol did not appear in an email my clients produced, I made sure that the @ symbols were preserved when converting this email to a .pdf for production.

With respect to your request for "ALL eBay emails to the buyer Nina Correria's proof of payment and all eBay emails from Nina Correria to Norb Novocin and Estate Auctions Inc.," my clients cannot produce documents that do not exist. We have discussed this issue *many* times.

Best,

-Anderson-
646.450.3607
HoganDuff.com

From: Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Date: Wednesday, November 16, 2022 at 8:59 AM

To: "Anderson J. Duff" <ajd@hoganduff.com>, Adam Bialek <adam.bialek@wilsonelser.com>, "Farmer, Jana S." <Jana.Farmer@wilsonelser.com>, "Haimson, Nicole" <Nicole.Haimson@wilsonelser.com>

Subject: Re: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

As per FRCP 30 (e) production of the two page document labeled Exhibit 4 and also EAI00058 and EAI00059 is due as per requested by WorthPoint's attorneys September 21, 2022 deposition.

On Page 75 of Mr. Norb Novocin's Deposition, Mr. Novocin has all his old emails from ebay sales. SEE ATTACHMENT.

Plaintiff is requesting as ALL eBay emails to the buyer
Nina Correria 's proof of payment and all eBay emails from Nina Correria to Norb Novocin and Estate Auctions Inc. be produced as soon as possible. ATTACHED are
recent emails from Nina Correria who claims that she has no written proof.

Exhibit
#6

EAI000060

From: eBay <ebay@ebay.com>
 Date: Sat, Dec 1, 2012 at 9:54 PM
 Subject: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)
 To: <ebay@novocin.com>



eBay sent this message to Norb & Marie Novocin (estateauctionsinc).
 Your registered name is included to show this message originated from eBay. [Learn more.](#)

Congratulations, your item sold!

Dear estateauctionsinc,

You did it! Your item sold. Please ship this item to the buyer after your buyer pays. As soon as your buyer pays, print your eBay shipping label.

Complete one of the following:

- [Print a shipping label](#). Avoid a trip to the post office, print and pay for your label at home. Printing shipping labels on eBay also offers you reduced pricing on some shipping services, and when you print shipping labels on eBay, your tracking information is uploaded automatically.
- [Provide shipping and tracking information](#). When you upload tracking information to eBay, we'll send it to your buyer and let them know the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.
- [Mark your item as shipped in My eBay](#). Do this, and we'll let your buyer know the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.

You should always [leave feedback](#) for your buyer to encourage them to buy from you again.

Provide shipping
information

[Go to My eBay](#)

	1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz
Sale price:	\$181.50
Quantity sold:	1
Sale date:	Dec-01-12 18:54:01 PST
Buyer:	nina correia 9naclock (ninacorreia@aol.com) [contact buyer]
Buyer's shipping address:	nina correia 14215 prairie flower ct reno, NV 89511-6710 United States
	Sell another item Send invoice to buyer

Select your email preferences

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For other email digest options, go to [Notification Preferences in My eBay](#)
- Don't want to receive this email? [Unsubscribe from this email.](#)

Email reference id: [#45d0df16f2ea40759d3656f834970b06#]

Please don't remove this number. eBay customer support may ask you for this number, if you should need assistance.

[Learn More](#) to protect yourself from spoof (fake) emails.

eBay sent this email to you at ebay@novocin.com about your account registered on www.ebay.com.

eBay sends these emails based on the preferences you set for your account. To unsubscribe from this email, change your [communication preferences](#). Please note that it may take up to 10 days to process your request. Visit our [Privacy Policy](#) and [User Agreement](#) if you have any questions.

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12/19/2022

Mail - Annamarie Trombetta - Outlook

Plaintiff is requesting a response today, November 16, 2022 as to when the full and entire eBay email for the 1972 Original Oil Painting Man With Red Umbrella also known as EXHIBIT # 4 in the Novocin Deposition will be produced.

B. The deponent has 30 days to review the transcript after the court reporter notifies him that the transcript is available. FRCP 30(e)(1); *EBC, Inc. v. Clark Bldg. Systems, Inc.*, 618 F.3d 253 (3d Cir. 2010); *Hambleton Bros. Lumber Co. v. Balkin Enterprises, Inc.*, 397 F.3d 1217 (9th Cir. 2005) (30-day period runs from court reporter's notice that transcript available, not from date deponent receives transcript). Notice to the deponent's attorney constitutes notice to the deponent and starts the running of the 30-day limit. *Welsh v. R.W. Bradford Transp.*, 231 F.R.D. 297 (N.D. Ill. 2005). The deponent must transmit the changes to the court reporter and certify the changes within 30 days of the notification; preparation of an errata sheet within 30 days does not satisfy the Rule. *Id.*

Submitted by,
Annamarie Trombetta

Exhibit #4

From: Annamarie Trombetta

Sent: Saturday, October 29, 2022 2:27 PM

To: ajd@hoganduff.com <ajd@hoganduff.com>; Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

Subject: Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Mr. Duff and to all parties,

Attached is are pages 74 to 79 of the September 21, 2022 Novocin Deposition. WorthPoint attorneys requested identified and called for the production of the two page December 1, 2012 email sale for the 1972 Original Oil Painting titled Man With Red Umbrella.

Production of this two page document labeled Exhibit 4 and also EAI00058 amd EAI00059 is requested immediately . Failure to produce these two documents will be noted to the Court in a letter on October 31, 2022.

Submitted October 29, 2022
Annamarie Trombetta

Yahoo Mail - Re: Annamarie Trombetta

Re: Annamarie Trombetta

Exhibit #8

4/5/22, 4:01 PM

From: Bob Bahr (babahr@yahoo.com)

To: trombettaart@yahoo.com

Date: Thursday, March 5, 2015, 09:53 AM EST

Date March 5
2015

Thanks. Very glad you liked it. Yes, that is the right link.

I will try to send you a PDF later so you have it in that form as well.

Hope we can paint together sometime when it's above freezing!

Bob

From: Annamarie Trombetta <trombettaart@yahoo.com>
To: Bob Bahr <babahr@yahoo.com>
Sent: Thursday, March 5, 2015 9:47 AM
Subject: Annamarie Trombetta

Ask Art Website

Hi Bob,

Thank you so much for a wonderful article. I have been sharing it with some of my collectors and colleagues and will do so with many more people. Also thank you for your recommendation for the Ask Artwebsite. I consent to include my biography listing to their site. Can you send me a link that is just this piece or is this the link below?? Also is there a magazine version that I can purchase.

I am please with the work that you selected as one of my collectors expressed her delight as well.

With sincere gratitude,
Annamarie Trombetta

http://www.outdoorpainter.com/artist-profiles/central-park-s-plein-air-past.html?utm_source=Art+List&utm_campaign=f24b0abe29-PAT_3_4_15&utm_medium=email&utm_term=0_6907cc7961-f24b0abe29-232018861

Yahoo Mail - A Big Thank you from Annamarie Trombetta

4/17/21, 9:27 PM

A Big Thank you from Annamarie Trombetta

From: Annamarie Trombetta (trombettaart@yahoo.com)

To: babahr@yahoo.com

Date: Saturday, June 6, 2015, 12:49 PM EDT

Exhibit
#9

Date June
2015

Hi Bob,

My sincere appreciation for including me once again in Outdoor Painter! I am indeed delighted as was the host of the show to learn that the link and a feature was in the Newsletter for Outdoor Painter.

It is the kind of situation that brings attention not just to me--the Magazine but also to the Hudson River School Painters who have done so much for this country's history in art, Parks and conservation.

Last thank you for the recommendation. I am delighted that my bio is now on AskArt-- Mille Grazie for that!

I hope to meet you in person one of these days. Let's plan a meeting if you live in the New York area. Take great care and all the best to you.

Warm Regards,
Annamarie Trombetta

Ask Art
2015

Plaintiff000153

Exhibit #10 Date September 22, 2015

INTERNET ARCHIVE
Wayback Machine
1 capture
22 Sep 2015

https://www.askart.com/artist/Annamarie_Trombetta/11156459/Annamarie_Trombetta.aspx

Go
2014 2015 2016
About this capture

askART

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q a b c d e f g h i j k l m n o p q r s t u v w x y z

Annamarie Trombetta

(born 1963)

Annamarie Trombetta is active/lives in New York. Annamarie Trombetta is known for geometric still life arrangements-painting.

The Artist

Auction Records

Buy / Sell

Resources

Overview

Auction Records (0)

For Sale (0)

Signatures (0)

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Biography

Upcoming Auctions (0)

Wanted (0)

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Dealers (0)

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Explore more than 680 billion web pages saved over time

https://www.asksart.com/artists/Annunziata_Trombetta/1156459/Annun

Results: 50 100 500

LINK

Calendar

Collections

Changes

Summary

Site Map

URLs

Date

Saved 1 time September 22, 2015.

September 22, 2015

1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019

2015

Exhibit #11

2015

Plaintiff000154

and painting skills. In the mid Eighties I attended The New York Academy of Art which focused on teaching the history and traditional techniques from periods of art, such as the Italian Renaissance, the classical and neoclassical periods in France, as well as the Spanish, Dutch and Flemish masters. Here I studied cast drawing, grisaille painting, anatomy, dissected cadavers, yet most influential to me was geometry and perspective.

During this period I traveled once again to France and Italy to study with my teachers who offered summer classes in art history, drawing and painting. I remember when I was in the French countryside feeling as if I was walking into a huge painting. The views felt so familiar due to the talents of Monet, Pissarro, VanGogh, etc. In my solitude I would envision them, particularly VanGogh in a wheat field painting or see the circular hay stacks change colors by sunset right before my eyes. The truth captured in their paintings a century ago felt so real to me, it spiraled an indelible influence. This experience still inspires me to strive towards capturing my subjects with a sense of presence and atmosphere. Visiting Italy again, my ancestral homeland, sharpened my acuity and attraction to works of art on uniquely shaped canvases. There were so many moments that will be with me throughout my life, most notable was to see the charcoal markings while walking in the ruins of ancient Rome, or to hear bells toll in St. Mark's Square, and to be within inches of some of the most revered art in the world.

When I returned to the States, the desire to develop artwork in various mediums became the goal. I started attending The National Academy School of Fine Arts to explore and perfect the media of pastels and figure painting, and also to study printmaking. During this time I was employed at The National Academy Museum. The Academy and its intriguing history filled the chasm of my knowledge for the heritage of American art while also informing me of the cultural developments in my country, particularly those in New York. The opportunity to read the Academy's books while I was working at the Museum, was an enlightening experience. I learned, most importantly, about the Hudson River School painters and their personal involvement with writer/poet William Cullen Bryant. This relationship between artists and writers of that time initiated the unfoldment of Central Park. The Park, which is adjacent to The National Academy Museum was already charted territory for my artistic expression. Learning about the creation of the Park intensified my passion for depicting it.

During my tenure at The Academy, a conversation with a museum visit led to my interest in the W.B. Yeats Society of New York, and another trip abroad. Coincidentally and perhaps synchronistically I had been attending lectures on Theosophy about the same time I was learning about Yeats. Crucial to my personal and professional development at that time was my comprehension of why Theosophy influenced the modern movement in the Arts. Yeats, like many other writers, musicians, and artists such as Mondrian and Klee, etc. drew inspiration from the philosophical texts written by the robust Russian, Madame Blavatsky. Within a few months I had won a scholarship under the auspices of the Yeats Summer School in Sligo, Ireland via the Yeats Society of New York.

A short trip to London, preceded the Summer School, where I hunted down John Singer Sargent's charcoal sketch of Yeats at the National Portrait Gallery. This inspired a trip to the Tate, and several other collections. Traveling to England first set the stage for the political, personal, and historical dynamics that I was about to encounter regarding the legacy of Yeats and of Ireland. Before the school commenced, there was a ceremonial service at Drumcliff Church where Yeats is buried. The picturesque view and the enigmatic words of his icy epitaph became etched in my memory on that day and inspired me to create a painting titled after his poem "Under Benbulbin" which elaborates on his immortal words. To learn about his family, his life and his vision motivated me to begin a new chapter in creating my own work.

To culminate my journey, when I returned home I gathered the metaphorical leaves and branches that had fallen from my artistic tree, be it ancestral or archetypal and concentrated "souly" on "The Holy Tree" described in Yeats' poem "The Two Trees." This image, inspired by the milieu of a mentor miles away is a tribute to his gifts and determined ways which regenerated and awakened the visionary in me. This catalogue highlights the pictorial progression from that trip and the time that followed.

I wish to acknowledge certain individuals who have enhanced my artistic sensibilities as a person, as well as an artist. These individuals include Everett Raymond Kinster, Raymond Steiner, Harvey Dinnerstein, Burton Silverman, the artist's in The Painting Group particularly Aaron Shikler, David Levine, Danny Schwartz, Irene Hecht. I thank them for their help and guidance in my life.

Source:
The website of the artist

If you discover credit omissions or have additional information to add, please let us know at registrar@AskART.com.

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441B/17#62

Annamarie Trombetta (1963.)

Artist Search

artist last name	first name (optional)	
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About Annamari Trombetta

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Summary
Quick facts
Biography^{xx}
Book references
Discussion board
Magazine references pre-2007
Magazine references^{xx}

For sale ads
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Dealers
What's my art worth?
Market Alert - Free

Auction results
Auctions upcoming for her
Auction sales graphs
Magnum ads pre-1998
Place a classified ad

University of Illinois at Chicago

Lived/Active: New York **Known for:** geometric still life arrangements-painting

Available for Annamarie Trombetta:

Quick facts (Styles, locations, mediums, teachers, subjects, geography, etc.)

Biographical information

Book references (Anderson, Thompson)

Magazine references

Discussion board entries

☒ Please send me Alert Updates for Annamarie Trombetta

What is a alert list?

10

This biography from the Archives of AskART:

The nature of an artist's life, creativity and growth may be synonymously expressed in the image of an archetypal tree. Beginning with the earthly descendent roots the artist like the tree branches out into its surrounding environmental and celestial world. Both ascend and descend, widening their girth of consciousness while producing visual imagery, weathering each season of change. Thus, I believe it is the nature of the artist and of nature itself to regenerate and manifest. All of the imagery in this catalog was either created en plein air or from the subject directly.

my journey to becoming an artist began many years ago. The consanguineous roots of my Italian family tree provided me with an innate constitution for my artistic profession. When I was a tiny seed of contemplative thought, my artistic nature began to sprout interest while gazing up at the ceiling paintings in a neighborhood church named Regina Pacis, meaning Queen of Peace. The church located in Brooklyn, NY features ceiling paintings, sculptures, marble interiors, and incorporates architectural elements for the facade and the belfry that are of Italianate design. Before the age of three I was able to surmise that the church in the ceiling painting was indeed the church I was in. The visual stimulation was a form of education. It fostered my sense of perception which became my strongest mode for acquiring knowledge.

As the years unfurled, my family moved to Staten Island. At this time it was a scenic field of luminosity, lush vegetation and a harbor view complete with sailboats and small yachts. A few years after we moved my tree of life was in jeopardy of losing a limb. What appeared to be a swollen leg was indeed a cancerous tumor. It was an almost fatal or perhaps even a fated occurrence in my life. The struggle to survive the experience was lightened by my imagination and by my artistic ability to create. I seriously thought I would go into medicine but the posters and paintings in the hospital and doctor's office held my attention more intensely.

I began my formal training at The Brooklyn Museum School of Art while I was in high school. The exposure to various forms of art inspired me to expand my horizons and in the early Eighties I traveled on a summer tour to Europe. The tour comprised of six countries; Germany, Austria, France, Italy, Switzerland and England. Viewing so many different cities and cultures in a concentrated period of time helped me to see the similarities as well as the differences of each quite clearly.

Upon my return I enrolled in an art history course to examine the content of art in relation to its chronological, political and historical relevance while applying

WP000143

to art colleges. I was accepted to Parsons School of Design located in lower Manhattan. The pulsating pace of this compressed cosmopolitan city was reflected in the school's curriculum. Although I did enjoy the challenges and experiences which expanded my capabilities, I was not satisfied with the level of my drawing and painting skills. In the mid Eighties I attended The New York Academy of Art which focused on teaching the history and traditional techniques from periods of art, such as the Italian Renaissance, the classical and neoclassical periods in France, as well as the Spanish, Dutch and Flemish masters. Here I studied cast drawing, grisaille painting, anatomy, dissected cadavers, yet most influential to me was geometry and perspective.

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Source:

The website of the artist

*** If you discover credit omissions or have additional information to add, please let us know at registrar@AskART.com.*

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EXHIBITION #138

Gmail - FW: Activity in Case 1:18-cv-00993-RA-SLC Trombetta v. Novocin et al Letter



Annamarie Trombetta <atrombettaart@gmail.com>

FW: Activity in Case 1:18-cv-00993-RA-SLC Trombetta v. Novocin et al Letter

Bialek, Adam <Adam.Bialek@wilsonelser.com>

Fri, Dec 2, 2022 at 4:05 PM

To: Anderson Duff <ajd@hoganduff.com>, Annamarie Trombetta <annamarietrombettalegal@outlook.com>, Annamarie Trombetta <atrombettaart@gmail.com>

Cc: "Haimson, Nicole" <Nicole.Haimson@wilsonelser.com>, "Farmer, Jana S." <Jana.Farmer@wilsonelser.com>

Dear Ms. Trombetta:

I agree with Mr. Duff here. Moreover, as I previously noted and stated during the call, I was providing things as a courtesy to you as your fights with Mr. Duff on matters that had been resolved were taking too much time and effort and causing my client to unnecessarily spend money. This is a case where no good deed goes unpunished. I did not have to send Mr. Duff's prior production of the sales receipt, nor the meta data, but since his disclosure was available to me, I saw no reason why not to try to short circuit the issue and provide to you what had already been produced. I informed you and the Court during the call that I was doing it as a courtesy so we could put the issue to bed. If my courtesies for you are only going to generate more attacks on me, my firm and my client, then I do not need to help you. I have tried to be helpful recognizing that you are pro se and claim that you have no idea of the rules (even despite the Court's multiple explanations and directions). Your attempts to malign me for trying to be helpful will not be forgotten. And, like Mr. Duff's claims, will be used to seek reimbursement of my client's fees under Section 505 of the Copyright Act.

I strongly urge you to heed the advice of the Court. Try to pick up the phone next time and have a meet and confer. You will save time, money and aggravation of all concerned. And for someone who is so bent out of shape over a claim about her reputation since someone paid \$182.50 for a damaged painting by an artist who signed the work A. Trombetta, you might consider how your intentionally misleading, frivolous and attacking misrepresentations might impact others. You have no problem sullyng someone else's reputation INTENTIONALLY, while you claim what was done to you as a simple mistake (at best) is egregious. It is my understanding the neither my client nor the Novocins even knew who you were before this, and there has been no evidence produced to the contrary.

You close your letter with: "I truly filed this lawsuit to legally "Declare" I am not the artist, nor is it my signature on their 1972 oil painting "1972 Man With Red Umbrella. To date, neither Defendant has identified the artist." At some point, your intentions must have changed, and for reasons that defy comprehension. If you truly only wanted to declare that you are not the artist who painted the painting sold by the Novocins to Ms. Correia on eBay in 2012, then this case would have been over long ago. And, if you stepped back and considered that WorthPoint (and I presume the Novocins) had no way of knowing who painted the painting,, then you would have tried to resolve this matter long ago. Yet, you continue to believe that this case is worth hundreds of thousands of dollars and refuse to negotiate a settlement that reflects what you want. It is for that reason, you and the defendants are going to waste hundreds of more hours on a case where you cannot get from my client the relief you are seeking (nor will you prevail as there are several defenses that will prevent you from recovering anything from WorthPoint). If you instead want to address the stated intent of your lawsuit, rather than seek hundreds of thousands of dollars, please let us know. In the interim, please follow the Court's directions and refrain from your misguided attacks.

Regards,

Adam

Adam Bialek
Attorney at Law

Motion To Dismiss EXHIBIT

Fulton County Superior Court

EFILEDLW

Date: 6/14/2022 4:01 PM

Cathelene Robinson, Clerk

#15 - Georgia

IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303

SUMMONS

WORTHPOINT CORP., SHARI SEIPPEL,

) Case

2022CV366175

) No.:

AND WILLIAM SEIPPEL

Plaintiff,

vs.

ANNAMARIE TROMBETTA

Defendant

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tvlerhost.net/ofswab> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

Mary Trachian-Bradley (mtrachian@briskinlaw.com)
BRISKIN, CROSS & SANFORD, LLC
33 S. Main Street, Suite 300, Alpharetta, GA 30009

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 6/14/2022 day of _____, 20____

Honorable Cathelene "Tina" Robinson
Clerk of Superior Court

By *Justin M. Reyes*
Deputy Clerk

To defendant upon whom this petition is served:
This copy of complaint and summons was served upon you _____, 20____

Deputy Sheriff

Instructions: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum is used

No Date or Signature Empty

Fulton County Superior Court
FILEDLW

Motion to Dismiss

EXHIBIT 16

10.

Trombetta was directed to file her purported Amended Complaint by January 17, 2020. On that date Trombetta filed a pleading entitled "Proposed Amended Complaint."

11.

Trombetta then untimely filed a pleading entitled the "Operative Amended Complaint" on February 21, 2020.

12.

Trombetta's Amended Complaint alleged claims against WorthPoint, worthpoint.com, WSeippel, and Jason Packer, a WorthPoint employee.

13.

On March 19, 2020, Trombetta was ordered to effect service of the Amended Complaint on WorthPoint and WSeippel. Ms. Trombetta failed to properly effect service.

14.

On April 6, 2020, Trombetta was again ordered to effect service of the Amended Complaint on WorthPoint and WSeippel no later than May 21, 2020. Ms. Trombetta failed to properly effect service.

15.

Approximately one (1) full year after filing the Amended Complaint, Trombetta arranged service of process on WorthPoint and WSeippel. On Jan 1, 2020, service was delivered via certified mail to WorthPoint. On January 4, 2020, service was delivered via Certified Mail to WSeippel and SSeippel's home residence.

Wrong Year
Wrong Year

1/14/2021

USPS.com® - USPS Tracking® Results

ALERT: USPS IS EXPERIENCING UNPRECEDENTED VOLUME INCREASES AND LIMITED EMPL...

USPS Tracking®

FAQs >

Track Another Package +

Exhibit # ~~17~~ Page 1
17

Tracking Number: 70190160000091348478

Remove X

Your item was delivered to an individual at the address at 1:54 pm on January 11, 2021 in ROSWELL, GA 30075.

✓ Delivered

January 11, 2021 at 1:54 pm
Delivered, Left with Individual
ROSWELL, GA 30075

Get Updates v

Text & Email Updates

Tracking History

January 11, 2021, 1:54 pm
Delivered, Left with Individual
ROSWELL, GA 30075

Your item was delivered to an individual at the address at 1:54 pm on January 11, 2021 in ROSWELL, GA 30075.

January 11, 2021, 6:10 am
Out for Delivery
ROSWELL, GA 30075

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com.

ROSWELL, GA 30075

Certified Mail Fee \$3.55

Extra Services & Fees (check box, add fee to total)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$2.80

Total Postage and Fees \$9.20

Postmark Here 01/04/2021

Signature of Addressee: William H. Seippel, Sharon A. Seippel

Street and Apt. No., or P.O. Box No. 190 Inwood Terrace

City, State, ZIP+4® Roswell, Georgia, 30075

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Feedback

Marked on Jan 4, 2021

Exhibit #18
Page 1

Fulton County Superior Court
FILED
Date: 10/28/2022 3:45 PM
Cathelene Robinson, Clerk

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

WORTHPOINT CORP., SHARI
SEIPPEL, AND WILLIAM SEIPPEL,

PLAINTIFFS,

V.

ANNAMARIE TROMBETTA,

DEFENDANT.

Civil Action

File Number: 2022 CV 366175

AFFIDAVIT OF FREDDI SIMON

STATE OF New York :

:

COUNTY OF New York :

:

PERSONALLY APPEARED before me, the undersigned officer duly authorized by law to administer oaths, MR. FREDDI SIMON, who after first being duly sworn, deposes and states as follows:

1.

My name is Freddi Simon. I am over the age of majority, and I am competent in all respects to testify regarding the matters set forth herein. I give this affidavit voluntarily in support of the Affidavit of Service filed with this Court on September 1, 2022 and dated August 30, 2022. I have personal knowledge of the facts stated herein and know them to be true and correct.

2.

I have been employed as a private process server for approximately (4) years.

Exhibit #18
Page 2

3.

I was asked to perfect personal service on the Defendant on August 30, 2022.

4.

I was provided a picture of the Defendant and was told an address where the Defendant would be present.

5.

I was informed upon my arrival at the address noted that the Defendant was still upstairs. I waited outside of the building until such time as I saw the Defendant exit. I knew it was Defendant because I had verified the clothing worn by the Defendant on that day.

6.

At approximately 7:35 pm, I approached the Defendant and called her name several times.

7.

The Defendant was engaged in a phone call and originally failed to stop as I called her name.

8.

As Defendant was on the phone, I approached her asking her questions related to service of process. At this time, she looked up at me and stated, "sorry."

9.

I started handing her the Summons and Complaint.

10.

I was forced to place the legal documents directly on her arm, by her elbow, when the Defendant refused to extend her arm to take the Summons and Complaint.

Exhibit ~~118~~
Page 3

11.

At this time, the Defendant grabbed the Summons and Complaint and walked away.

12.

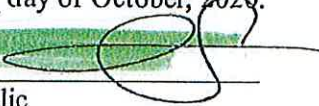
Service was perfected at approximately 7:40-7:50pm.

False
Statements

FURTHER AFFIANT SAYETH NOT.


FREDDI SIMON

Sworn to and subscribed before me
This 28th day of October, 2020.


Notary Public

My commission expires: 9-25-2025


[NOTORIAL SEAL]



Exhibit #19

Fulton County Superior Court

EFILEDMH

Date: 10/31/2022 4:34 PM

Cathelene Robinson, Clerk

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

Page 1

WORTHPOINT CORP., SHARI
SEIPPEL, AND WILLIAM SEIPPEL,

PLAINTIFFS,

V.

ANNAMARIE TROMBETTA,

DEFENDANT.

Civil Action

File Number: 2022 CV 366175

PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT
IN RESPONSE TO DEFENDANT'S MOTION TO DISMISS

COME NOW Plaintiffs WORTHPOINT CORP., SHARI SEIPPEL and WILLIAM SEIPPEL (hereinafter collectively referred to as "Plaintiffs") and move pursuant to O.C.G.A § 9-11-55, for judgment on all counts of Plaintiffs' ("Complaint") against Defendant ANNAMARIE TROMBETTA, and show this Court the following:

1.

Plaintiffs caused Defendant to be served personally with a true and correct copy of the Summons and Complaint, which service was perfected by a private process server on August 30, 2022, as reflected in the *Affidavit for Entry of Service* filed on September 1, 2022.

2.

Service was properly effectuated as set forth in the two (2) Affidavits of Service filed with this Court.

3.

Defendant acknowledged receipt of the Summons and Complaint on August 30, 2022.

Exhibit #9 Page 2

4.

More than thirty (30) days elapsed prior to Defendant sending an electronic copy of a responsive pleading. The electronic copy was (1) untimely and (2) did not effectuate proper filing within the State of Georgia.

5.

More than thirty (30) days elapsed prior to Defendant filing her first responsive pleading on November 5, 2022

6.

At the time that Defendant filed her response on November 5, 2022, Defendant was in default.

7.

No costs have been paid by Defendant, and said default has not been opened as a matter of right in the manner set forth in O.C.G.A. § 9-11-55.

8.

By virtue of Defendant's failure to open her default, Defendant has admitted all well-pleaded allegations contained in the Complaint, as well as all reasonable inferences that could be drawn from such allegations. Stroud v. Elias, 247 Ga. 191, 193 (1981).

9.

The facts alleged in the Complaint show that Defendant is liable to Plaintiffs for claims for abusive litigation and emotional distress.

10.

The torts committed by Defendant were knowingly committed by Defendant within Fulton County, Georgia.

WorthPoint

Exhibit
7/19

11.

Plaintiff WorthPoint Corp. is entitled to an order of default judgment against Defendant, pursuant to O.C.G.A. § 9-11-55, as to their request for Eighty Five Thousand and 00/100 Dollars (\$85,000.00) in damages for abusive litigation.

12.

Plaintiff William Seippel is entitled to an order of default judgment against Defendant, pursuant to O.C.G.A. § 9-11-55, as to his request for Forty Thousand and 00/100 Dollars (\$40,000.00) in damages for abusive litigation.

13.

Plaintiffs William Seippel and Shari Seippel request that the Court enter an order for default on their claim for emotional distress and set such matter for a hearing.

WHEREFORE, Plaintiffs pray that this Court enter a Default Judgment against Defendant showing that Plaintiffs are entitled to:

1. Liquidated Damages in favor of Plaintiff WorthPoint Corp for Eighty Five Thousand and 00/100 Dollars (\$85,000.00) for abusive litigation.
2. Liquidated Damages in favor of Plaintiff William Seippel for Forty Thousand and 00/100 Dollars (\$40,000.00) for abusive litigation.
3. Damages for infliction of emotional distress and attorney fees in an amount to be determined by the Court; and
3. Such further relief as the Court should deem just and appropriate.

Worth Post

Exhibit

Respectfully submitted this 31st day of October, 2022.

BRISKIN, CROSS & SANFORD, LLC

By: /s/ Mary Trachian-Bradley
Mary Trachian-Bradley
Georgia Bar Number 774440
Attorney for Plaintiffs

#19

33 South Main Street, Suite 300
Alpharetta, GA 30009
(770) 410-1555
(770) 410-3281 (fax)
mtrachian@briskinlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served via electronic filing which provides service on all parties of record.

Respectfully submitted this 31st day of October, 2022.

BRISKIN, CROSS & SANFORD, LLC

By: /s/ Mary Trachian-Bradley
Mary Trachian-Bradley
Georgia Bar Number 774440
Attorney for Plaintiffs

33 South Main Street, Suite 300
Alpharetta, GA 30009
(770) 410-1555
(770) 410-3281 (fax)
mtrachian@briskinlaw.com